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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JOSE ALEXANDER ESCOBAR,

Plaintiff

v.

UNITED STATES OF AMERICA; DOES I
through XX, inclusive; and ROE BUSINESS
ENTITIES I through XX, inclusive,

Defendants

Case No: 2:22-cv-01419-CDS-DJA

**ORDER GRANTING STIPULATION
FOR CONTINUANCE OF JOINT
PRE-TRIAL ORDER DEADLINE**

(Third Request)

[ECF No. 17]

Plaintiff Jose Alexander Escobar and Defendant United States of America, by and through their undersigned counsel, hereby agree and stipulate to extend the deadline to file the joint pretrial order from September 7, 2023, to September 21, 2023. This is the third request to extend the deadline for the joint pretrial order. The basis for the requested extension is set forth below in the Declaration of Daniel C. Tetreault, Esq., counsel for Plaintiff Jose Alexander Escobar.

Discovery closed in this matter on May 8, 2023. The joint pretrial order is currently due on July 7, 2023. The reason for this stipulation is that the parties are currently in settlement

discussions, and the joint pretrial order will be unnecessary if the parties reach a settlement in this case.

**DECLARATION OF DANIEL C. TETREAULT, ESQ IN SUPPORT OF REQUEST TO
CONTINUE DEADLINE FOR JOINT PRE-TRIAL ORDER**

DANIEL C. TETREAULT, ESQ., being first duly sworn, deposes and says:

1. I am an attorney duly licensed to practice law in the State of Nevada, and in the federal District Court in and for the District of Nevada. I am counsel for Plaintiff, JOSE ALEXANDER ESCOBAR, in Case No. 2:22-cv-01419-CDS-DJA , and I have personal knowledge of the facts offered herein;

2. I joined Plaintiff's law firm on July 17, 2023. Since that time, I have been actively getting familiarized with the facts and procedural postures of the respective case load assigned to me;

3. One of those cases was the instant matter, styled as *Escobar v. United States*. It is my understanding that there were active settlement discussions between the United States and former counsel for Plaintiff;

4. I have been in contact with counsel for the United States, Stephen Hanson, regarding the current posture of settlement discussions, and I have been actively attempting to contact and convey the offer to Plaintiff in an attempt to determine whether this matter may be resolved;

5. The parties requested a prior extension on August 7, 2023, to extend the date of the Pre-Trial memorandum. Since that time, I have been actively attempting to contact my client to attempt to facilitate a potential settlement. The parties are in active discussion regarding settlement and are hopeful a resolution may be reached. In addition, the undersigned counsel has recently contracted Covid-19, and due to illness, the parties seek an extension both to attempt to complete settlement as well as to allow counsel to recover sufficiently.

6. Therefore, the parties respectfully request an additional two-week (14) day extension to the deadline to file the Joint Pre-Trial Order, or until **September 21, 2023**.



7. That I make this Declaration under penalty of perjury and attest to the truth of all matters stated herein.

FURTHER DECLARANT SAYETH NAUGHT.

DATED this 7th day of September 2023.

/s/ Daniel C. Tetreault
DANIEL C. TETREAULT, ESQ.

For the foregoing reasons, the parties stipulate extending the deadline for the joint pretrial order to **September 21, 2023**.

Respectfully submitted this 3rd day of August 2023.

DATED this 7th day of September 2023. DATED this 7th day of September 2023.

LADAH LAW FIRM

/s/ Daniel C. Tetreault

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Attorneys for Plaintiff

JASON M. FRIERSON
United States Attorney

/s/ Stephen R. Hanson II

STEPHEN R. HANSON II, ESQ.
Assistant United States Attorney

IT IS SO ORDERED.


United States District Judge

DATED: September 12, 2023

LADAH LAW
— F I R M —

